

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

ING LIFE INSURANCE AND ANNUITY
COMPANY

Plaintiff,

v.

KUMBIRAI CHIWARA USHE,

FIDES PERDITA USHE AS MOTHER
AND NATURAL GUARDIAN OF
KUMBIRAI CHIWARA USHE,

CIVIL ACTION NO. 1:04-11571- GAO

ZVIDAZI G. USHE,

DUMAZILE G. USHE,

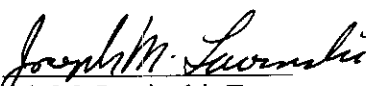
NTOMBIZODWAK KUMALO-USHE
(LAST SPOUSE OF SAMSON CHIWARA
USHE), individually and as Administratrix
Of the ESTATE OF SAMSON CHIWARA
USHE

Defendants.

UNOPPOSED MOTION FOR TRANSFER

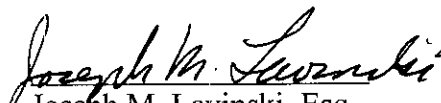
Interpleader Defendants, Kumbirai Chiwara Ushe and Fides P. Ushe (“Movants”) hereby move for *transfer* of this action to the *Western Division* of the Honorable Court. This motion is submitted without opposition from any party. As noted by the Court at the status conference of February 14, 2005, this case is appropriate for transfer, because Springfield is the most convenient forum for the claimants to the interpleader funds at issue, and no further activity in this suit is contemplated by the Court or any party until the transfer is completed.

Respectfully submitted
Interpleader Defendants,
Kumbirai Chiwara Ushe
and Fides P. Ushe

By 
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their Attorney

LOCAL RULE 7.1 (A) (2) CERTIFICATE

I hereby certify that this motion requests court action unopposed by all parties, and that no party opposes this motion.


Joseph M. Lavinski, Esq.


CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon all counsel of record or unrepresented parties by first class mail, postage pre-paid on April 25, 2005, as follows:

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